

EXHIBIT E



THE UNITED STATES ATTORNEY'S OFFICE
SOUTHERN DISTRICT *of* NEW YORK

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Department of Justice

U.S. Attorney's Office

Southern District of New York

FOR IMMEDIATE RELEASE

Friday, June 24, 2022

Two Men Charged With Plan To Commit Home Invasion Robbery For Tens Of Millions Of Dollars In Bitcoin

Damian Williams, the United States Attorney for the Southern District of New York, and Michael J. Driscoll, Assistant Director-in-Charge of the New York Office of the Federal Bureau of Investigation ("FBI"), announced the unsealing today of an Indictment charging DOMINIC PINEDA and SHON MORGAN with conspiracy to commit Hobbs Act robbery in May 2020 in Irvington, New York. PINEDA and MORGAN were arrested yesterday in Virginia and will be presented this afternoon in the Eastern District of Virginia.

U.S. Attorney Damian Williams said: "As alleged in the indictment, the defendants participated in a violent plan to break into a family's home in the middle of the night and force its residents to provide the code to what the defendants believed was tens of millions of dollars in Bitcoin currency. Thanks to the work of the FBI, the defendants will now be held responsible for the alleged acts."

As alleged in the Indictment unsealed today in White Plains federal court[1]:

From May 18, 2020 to May 24, 2020, DOMINIC PINEDA and SHON MORGAN participated in a plan to break into a home in Irvington, New York and rob its residents of cash and cryptocurrency.

* * *

PINEDA, 21, of Manassas, Virginia, and MORGAN, 21, of Centreville, Virginia, are each charged with conspiracy to commit Hobbs Act robbery, in violation of 18 U.S.C. § 1951, which carries a maximum term of 20 years in prison.

The maximum potential sentence in this case is prescribed by Congress and is provided here for informational purposes only, as any sentencing of the defendants will be determined by the judge.

Mr. Williams praised the outstanding investigative work of the FBI Westchester County Safe Streets Task Force, which is comprised of special agents and task force officers from the FBI, U.S. Probation, New York State Police, New York State Department of Corrections and Community Supervision, Putnam County Sheriff's Office, Westchester County DAs Office, Rockland County DAs Office, NYPD, Westchester County PD, and the Yonkers, New Rochelle, Mount Vernon, Greenburgh, White Plains, Peekskill, Ramapo, and

Clarkstown Police Departments and thanked the Irvington Police Department and the Greenburgh Drug and Alcohol Task Force for their assistance in the investigation and prosecution of PINEDA and MORGAN.

This case is being handled by the Office's White Plains Division. Assistant United States Attorney Courtney L. Heavey is in charge of the prosecution.

The charges contained in the Indictment are merely accusations, and the defendants are presumed innocent unless and until proven guilty.

[1] As the introductory phrase signifies, the entirety of the text of the Indictment and the descriptions of the Indictment constitute only allegations, and every fact described should be treated as an allegation.

Attachment(s):

[Download u.s. v. pineda and morgan indictment.pdf](#)

Component(s):

[USAO - New York, Southern](#)

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